

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ZOHO CORPORATION,

Plaintiff,

V.

LIBERTY PEAK VENTURES, LLC,

Defendant.

LIBERTY PEAK VENTURES, LLC,

Counterclaimant,

V.

ZOHO CORPORATION,

Counter-Defendant,

and

ZOHO CORPORATION PVT. LTD.

Third-Party Defendant.

Civil Action No. 1:22-cv-37-LY

# JURY DEMANDED

## JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court's Scheduling Order, the parties hereby submit the Joint Claim Construction Statement attached as Exhibit A.

Dated: January 13, 2023

/s/ Matthew C. Acosta

Matthew C. Acosta  
Texas Bar No. 24062577  
macosta@pcrfirm.com  
Andrew Lin  
Texas Bar. No. 24092702  
alin@pcrfirm.com  
Nicholas C. Kliever  
Texas Bar No. 24083315  
nkliever@pcrfirm.com

**PLATT CHEEMA RICHMOND PLLC**

1201 N. Riverfront Blvd., Suite 150  
Dallas, Texas 75207  
214.559.2700 Main  
214.559.4390 Fax

**COUNSEL FOR LIBERTY PEAK  
VENTURES, LLC**

Respectfully submitted,

/s/ Phillip Haack

Ryan Marton (admitted *pro hac vice*)  
Phillip Haack (admitted *pro hac vice*)  
MARTON RIBERA SCHUMANN &  
CHANG LLP  
548 Market Street, Suite 36117  
San Francisco, CA 94104  
Telephone: (415) 360-2515  
Email: ryan@martonribera.com  
phil@martonribera.com

Darryl Adams  
Texas State Bar No. 00796101  
dadams@sgbfirm.com  
SLAYDEN GRUBERT BEARD PLLC  
401 Congress Ave., Ste. 1650  
Austin, Texas 78701  
Telephone: (512) 402-3550  
Facsimile: (512) 402-6865

*Attorneys for Zoho Corporation and  
Zoho Corporation Pvt. Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Matthew C. Acosta  
Matthew C. Acosta